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9 *Counsel for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**
 9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,
 11 PASSENGER SEXUAL ASSAULT
 12 LITIGATION

13 MDL No. 3084 CRB

14 Honorable Charles R. Breyer

15 This Document Relates to:

16 **DECLARATION OF DOUGLAS
 17 GRUBBS IN SUPPORT OF PULAKSI
 18 KHERKHER, PLLC'S MOTION TO
 19 WITHDRAW AS COUNSEL OF
 20 RECORD**

21 *V.B. vs. Uber Technologies, Inc., et al.,*
 22 *3:25-cv-06705;*

23 *M.W. vs. Uber Technologies, Inc., et al.,*
 24 *3:25-cv-05474; and*

25 *E.B. vs. Uber Technologies, Inc., et al.,*
 26 *3:24-cv-07491*

27 I, Donald Douglas Grubbs, declare:

28 1. I am an attorney with the law firm of Pulaski Kherkher, PLLC (hereinafter “PK” or
 29 “firm”). I am a member of the State Bar of Texas and am admitted to practice *pro hac vice*
 before this Court. I make this declaration based on my own personal knowledge. If called upon
 to testify, I could and would testify competently to the truth of the matters stated herein.

30 2. On August 21, 2025, I met and conferred with opposing counsel regarding the validity
 31 of the above-referenced Plaintiffs’ ride receipts. In the days prior to the meet and confer, I had
 32 re-reviewed the ride receipts that Plaintiffs had provided during the case intake process. During

1 the meet and confer zoom, I advised opposing counsel at Shook, Hardy & Bacon of my firm's
2 intention to withdraw should the above-referenced Plaintiffs fail to provide additional ride
3 receipt proof.

4 3. Relying on Defendants' representations during our meet and confer zoom, I emailed
5 the above-referenced Plaintiffs the afternoon of August 21, 2025 explaining Uber's concerns
6 and requesting that Plaintiffs provide my firm with any additional proof of their ride at issue,
7 *e.g.*, the email that Uber typically sends upon ride completion.

8 4. My firm followed up with the above-referenced Plaintiffs via telephone and email on
9 August 29, 2025, *i.e.*, the date after Defendants filed their second motion to show cause (ECF
10 3784). On September 2, 2025, my firm also mailed correspondence via 2-day Federal Express
11 giving Plaintiffs until September 9, 2025 to provide any additional proof otherwise my firm
12 would initiate the process of withdrawing as their attorneys.

13 5. At the time of filing this declaration, no additional ride receipt proof has been provided
14 by the above-referenced Plaintiffs nor substitute counsel identified.

15 6. My firm has taken reasonable steps to protect the interests and avoid any prejudice to
16 the above-referenced Plaintiffs by informing them of their options and consequences of failing
17 to respond or provide ample time to produce additional proof of the Uber ride at issue. PK's
18 withdrawal from these cases will not impact the timing or schedule of this litigation.

19 7. I understand that pursuant to Local Rule 11-5(b) that leave to withdraw may be
20 conditioned on my firm continuing to accept papers to forward to Plaintiffs and accept this role
21 should the Court require.

22 8. A courtesy copy of this declaration will be served upon the above-referenced Plaintiffs
23 at their last known address and via electronic mail.

24
25 Executed on September 10, 2025 in Houston, Texas.

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1 Dated: September 11, 2025

2 Respectfully submitted,

3 **PULASKI KHERKHER, PLLC**

4 /s/ D. Douglas Grubbs

5 D. Douglas Grubbs (TX Bar No. 24065339)

6 (*Admitted Pro Hac Vice*)

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12 Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2025, I electronically transmitted the foregoing DECLARATION OF D. DOUGLAS GRUBBS IN SUPPORT OF PULASKI KHERKHER, PLLC'S MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs